

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.¹

PROMESA Title III

Case No. 17-BK-3283-LTS

(Jointly Administered)

**JOINDER OF BRANCH BANKING AND TRUST COMPANY, BB&T SECURITIES, LLC,
REGIONS BANK AND THE HUNTINGTON NATIONAL BANK TO THE JOINT
LIMITED OBJECTION OF BANK DEFENDANTS TO URGENT MOTION OF THE
FINANCIAL OVERSIGHT AND MANAGEMENT BOARD OF PUERTO RICO TO
ENFORCE ORDER UNDER BANKRUPTCY RULES 1007(I) AND 2004 AUTHORIZING
DISCOVERY AND COMPELLING DISCLOSURE OF LISTS OF SECURITY HOLDERS**

To the Honorable United States District Judge Laura Taylor Swain:

Branch Banking and Trust Company, BB&T Securities, LLC, Regions Bank and The Huntington National Bank (collectively, the “Joining Parties”) hereby submit this joinder to the *Joint Limited Objection of Bank Defendants to Urgent Motion of the Financial Oversight and Management Board of Puerto Rico to Enforce Order Under Bankruptcy Rules 1007(i) and 2004 Authorizing Discovery and Compelling Disclosure of Lists of Security Holders*, ECF No. 6900 (the “Limited Objection”).

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)

1. On May 7, 2019, the Special Claims Committee for the Financial Oversight and Management Board for Puerto Rico (the “SCC”) filed the *Urgent Motion of the Financial Oversight and Management Board of Puerto Rico to Enforce Order Under Bankruptcy Rules 1007(i) and 2004 Authorizing Discovery and Compelling Disclosure of Lists of Security Holders*, ECF No. 6853 (the “Motion”).

2. On May 10, 2019, certain Participant Holders (as defined in the Motion) already sued by the SCC in one or more adversary proceedings filed in the above-captioned matter submitted the Limited Objection.

3. The Joining Parties, which entities have also been sued by the SCC in one or more adversary proceedings filed in the above-captioned matter, hereby join in the Limited Objections for the reasons set forth therein.

WHEREFORE, the Joining Parties respectfully request that the Court enter an order denying the Motion and instead enter an order substantially in the form requested by the Participant Holders in the Limited Objection, and grant the Joining Parties such other relief as this Court deems just and proper.

Dated: May 13, 2019

Respectfully submitted,

/s/ Luis M. Lluberas

Luis M. Lluberas
USDC No. 301703
MOORE & VAN ALLEN PLLC
100 North Tryon Street, Suite 4700
Charlotte, North Carolina 28211
Tel: (704) 331-3548
Fax: (704) 409-5675
E-mail: luislluberas@mvalaw.com

*Attorney for Branch Banking and Trust
Company, BB&T Securities, LLC, Regions
Bank and The Huntington National Bank*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.²

PROMESA Title III

Case No. 17-BK-3283-LTS

(Jointly Administered)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this same date, a true copy of the foregoing was filed through the Court's CM/ECF system, which will generate a notice to all CM/ECF participants in this case, and that a copy of the foregoing was sent by overnight mail to the Office of the United States Trustee for Region 21, Edificio Ochoa, 500 Tanca Street, Suite 301, San Juan, PR 00901-1922.

Dated: May 13, 2019

Respectfully submitted,

/s/ Luis M. Lluberias

² The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)